LAW OFFICES OF ALAN E. FERGUSON
Alan E. Ferguson, Esq., State Bar No. 103677
3200 Fourth Avenue, Suite 207
San Diego, CA 92103-5716
PH: 619-299-4999
FAX: 619-299-8121

Attorney for Material Witnesses

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(Honorable Peter C. Lewis)

UNITED STATES OF AMERICA, Plaintiff, v. Adrian Tejada-Garduza, et al., Material Witnesses.	Magistrate Case No. 08mj8512 JOINDER TO NOTICE OF MOTION AND MOTION FOR VIDEOTAPE DEPOSITION OF MATERIAL WITNESS AND REQUEST FOR STATEMENT OF REASONS IN SUPPORT OF COSTODY HRG DATE: 08/08/2008 TIME: 10:00 a.m. CRTRM: El Centro - 2nd Floor JUDGE: Peter C. Lewis

TO UNITED STATES ATTORNEY KAREN P. HEWITT, AND TO THE ATTORNEYS OF RECORD FOR CARLOS RAMOS-GALAMEZ AND JOUANNI FRANCISCO PEREZ-TINOCO, DEFENDANTS NAMED IN CRIMINAL CASE NUMBER 08CR1696-H ASSOCIATED HEREWITH:

PLEASE TAKE NOTICE that material witnesses Ruben Valadez-Arrendondo; Eusebio Martinez-Perez; Miguel Najera-Lopez; and Brenda Garcia-Ontiveros ("Material Witnesses") by and through their counsel, Alan E. Ferguson, join in the motion to set videotape depositions filed by Tamara D. DeHaan, for material witness Adrian Tejada-Garduza, to be heard on August 8, 2008, at 10:00 a.m., or as soon thereafter as counsel may be heard. The proposed order submitted by Tamara D. DeHaan is identical to that proposed by these four material witnesses, and therefore shall be submitted to the court via e-mail prior to the hearing.

MOTION

Material witnesses Ruben Valadez-Arrendondo; Eusebio Martinez-Perez; Miguel Najera-Lopez; and Brenda Garcia-Ontiveros ("Material Witnesses") by and through their counsel, Alan E. Ferguson, and pursuant to Federal Rules of Criminal Procedure, Rule 15, 18 U.S.C., §3144; and 18 U.S.C., §3142, hereby move this Court for an order to take their depositions by videotape, and release them at the conclusion of the depositions.

This motion is based on this joinder of motion, the memorandum of points and authorities and declarations submitted by Tamara D. DeHaan, attorney of record for Adrian Tejada-Garduza, filed herein, the records of the above-titled case, and all matters submitted to the court prior to the determination of this motion.

Dated: August 4, 2008

By: / S / *Alan E. Ferguson*
ALAN E. FERGUSON
Attorney for the Material Witness

LAW OFFICES OF ALAN E. FERGUSON
Alan E. Ferguson, Esq., State Bar No. 103677
3200 Fourth Avenue, Suite 207
San Diego, CA 92103-5716
PH: 619-299-4999
FAX: 619-299-8121

Attorney for Material Witnesses

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(Honorable Peter C. Lewis)

UNITED STATES OF AMERICA, Plaintiff, v. Adrian Tejada-Garduza, et al., Material Witnesses.	)	Magistrate Case No. 08mj8512 DECLARATION OF SERVICE Persons Served: Gary Burcham, Esq.; Stephen Demik, Esq.; U.S. Attorney; and Tamara DeHaan, Esq.

Under penalty of perjury, I declare:

1. I am an attorney duly licensed to practice law in the State of California, and before the United States District Court for the Southern District of California. I am over the age of eighteen and not a party to this action.

2. On August 4, 2008, I served the above-named persons with the following document: Joinder to Notice of Motion and Motion for Videotape Deposition of Material Witnesses and Request for Statement of Reasons in Support of Custody.

3. Service was effected by e-filing the document with the Southern District Court via CM/ECF and via e-mail.

Dated: August 4, 2008

By: / S / *Alan E. Ferguson*
ALAN E. FERGUSON
Attorney for the Material Witnesses